

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

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IN RE:	)	
	)	
SHANNELL JONES MCCALL	)	Case No. 20-31325-KRH
	)	Chapter 13
Debtor	)	

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**MOTION TO EXPEDITE HEARING ON MOTION  
TO INCUR DEBT AND TO SHORTEN NOTICE PERIOD**

COME NOW the Debtor, by counsel, and move this Court to Expedite the Hearing on her Motion to Incur Debt and to Shorten Notice Period, and in support thereof states as follows:

1. The Debtor filed this case under Chapter 13 of the U.S. Bankruptcy Code on March 9, 2020.
2. The Debtor has applied for and Basic Auto Sales RVA has approved a loan to the Debtor in the amount of \$21,357.38 plus interest at 16.99% per annum to be repaid with 72 equal monthly payments of \$475.00 for the purchase of a 2020 Nissan Altima or similar vehicle.
3. The Debtor needs to purchase the referenced vehicle because her current vehicle has broken down, and she needs a replacement vehicle to travel to and from work.
4. The purchase of the vehicle is in the best interest of the Debtor and will facilitate her ability to perform under her Chapter 13 Plan filed herein.
5. The Debtor's Chapter 13 Plan has been confirmed.

James E. Kane (VSB #30081)  
KANE & PAPA, P.C.  
1313 East Cary Street  
Richmond, VA 23219  
(804) 225-9500 (phone)  
(804) 225-9598 (fax)  
Counsel for Debtor

WHEREFORE, the Debtor respectfully requests that the Court expedite the hearing on their Motion to Incur Debt, Shorten the Notice Period required for said Motion, and grant her such other and further relief as is just and proper.

Dated: December 9, 2020

SHANNELL JONES MCCALL

By: /s/ James E. Kane  
Counsel

James E. Kane (VSB #30081)  
KANE & PAPA, P.C.  
1313 East Cary Street  
Richmond, VA 23219  
(804) 225-9500 (phone)  
(804) 225-9598 (fax)  
*Counsel for Debtor*

**CERTIFICATION**

I, James E. Kane, pursuant to Local Rule 9013-1(N), do hereby certify that:

1. I have carefully examined the matter and concluded that there is a true need for an emergency hearing,
2. I have not created the emergency through any lack of due diligence.
3. I have made a *bona fide* effort to resolve the matter without hearing.

By: /s/ James E. Kane  
James E. Kane

**CERTIFICATE OF SERVICE**

I hereby certify that on December 9, 2020, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all parties registered to receive notice thereof and will mail the same by first class mail, postage pre-paid, to the parties on the attached list.

/s/ James E. Kane  
Counsel for Debtor

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IN RE:	)	
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	)	Chapter 13
Debtor	)	

**NOTICE OF MOTION AND HEARING**

The above Debtor has filed papers with the Court to request an order to Expedite the hearing and to Shorten the Notice Period with respect to her Motion to Incur Debt.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then, you or your attorney must:

- File with the court, at the address shown below, a written request for a hearing [or written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for a hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above, to:

Clerk of Court  
United States Bankruptcy Court  
701 East Broad Street  
Richmond, VA 23219

You must also mail a copy to:

James E. Kane, Esquire  
KANE & PAPA, P.C.  
1313 East Cary Street  
Richmond, Virginia 23219

- Attend a hearing scheduled for **December 16, 2020 at 12:00 p.m. at U.S. Bankruptcy Court, 701 East Broad Street, Room 5000, Richmond, VA 23219.** If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Dated: December 9, 2020

SHANNELL JONES MCCALL

By: /s/ James E. Kane  
Counsel

James E. Kane (VSB #30081)  
KANE & PAPA, P.C.  
1313 East Cary Street  
Richmond, VA 23219  
(804) 225-9500 (phone)  
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/s/ James E. Kane  
Counsel for Debtor

Cascade Capital  
 Santander Consumer USA  
 1670 Corporate Cir  
 Petaluma, CA 94954-6946

Department Stores National Bank  
 c/o Quantum3 Group LLC  
 PO Box 657  
 Kirkland, WA 98083-0657

Dept. of Treasury -  
 Internal Revenue Service  
 P. O. Box 7346  
 Philadelphia, PA 19101-7346

(p)DSNB MACY S  
 CITIBANK  
 1000 TECHNOLOGY DRIVE MS 777  
 O FALON MO 63368-2222

IC System, Inc  
 Attn: Bankruptcy  
 Po Box 64378  
 Saint Paul, MN 55164-0378

(p)JEFFERSON CAPITAL SYSTEMS LLC  
 PO BOX 7999  
 SAINT CLOUD MN 56302-7999

Peroutka,Miller,Klima &Peters  
 8028 Ritchie Highway, Ste 300  
 Pasadena, MD 21122-1360

Santander Consumer USA  
 Attn: Bankruptcy  
 601 Penn St  
 Reading, PA 19601-3544

Trexis Insurance  
 PO Box 64378  
 Saint Paul, MN 55164-0378

Verizon  
 by American InfoSource as agent  
 4515 N Santa Fe Ave  
 Oklahoma City, OK 73118-7901

Verizon Wireless  
 P.O. Box 25505  
 Lehigh Valley, PA 18002-5505

Virginia Department of Taxatio  
 PO Box 2369  
 Richmond, VA 23218-2369

Wells Fargo Bank NA  
 Attn: Bankruptcy  
 1 Home Campus Mac X2303-01a  
 Des Moines, IA 50328-0001

Carl M. Bates  
 341 Dial 866-813-0912 Code: 8576180  
 P. O. Box 1819  
 Richmond, VA 23218-1819

James E. Kane  
 Kane & Papa, PC  
 1313 East Cary Street  
 P.O. Box 508  
 Richmond, VA 23218-0508

John P. Fitzgerald, III  
 Office of the US Trustee - Region 4 -R  
 701 E. Broad Street, Ste. 4304  
 Richmond, VA 23219-1849

Shannell Jones McCall  
 625 Westover Hills Blvd.  
 Apartment G  
 Richmond, VA 23225-4582

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified  
 by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Department Store National Bank/Macy's  
 Attn: Bankruptcy  
 9111 Duke Boulevard  
 Mason, OH 45040-0000

Jefferson Capital Systems LLC  
 Po Box 7999  
 Saint Cloud Mn 56302-9617

(d)Jefferson Capital Systems, LLC  
 Attn: Bankruptcy  
 16 Mcleland Road  
 Saint Cloud, MN 56303-0000

End of Label Matrix  
 Mailable recipients 19  
 Bypassed recipients 0  
 Total 19